

Mr. Craig A. Charles
Indiana Steel & Wire Acquisition Company, Ltd.
2200 East Jackson Street
Muncie, IN 47303

Re: 035-13610
Fourth Administrative Amendment to
Part 70 T035-6570-00048

Dear Mr. Charles:

Indiana Steel & Wire Acquisition Company, Ltd. (IS&W) was issued a Part 70 Operating Permit on September 24, 1998 to operate a stationary steel wire and cable manufacturing source. First, Second and Third Administrative Amendments to the Part 70 Operating Permit were issued on March 8, 1999, April 5, 1999 and April 23, 1999, respectively. A letter requesting the inclusion of two (2) natural gas fired boilers, each with a maximum heat input rate of 6.277 million British thermal units per hour, was received on December 13, 2000. The potential uncontrolled emissions from natural gas combustion in the two boilers are shown in the attached spreadsheets (page 1 and 2 of 2).

Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The new equipment is added to the list of insignificant activities and Section A.3 is revised as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1 (21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Asbestos abatement projects regulated by 326 IAC 14-10.
- (c) Pebble lime storage silo with a 30 ton storage capacity, with particulate matter controlled by a baghouse, exhausting at one (1) stack.
- (d) One (1) electric arc furnace (EAF) with a maximum melt capacity of 100 pounds of metal per hour.
- (e) **Two (2) natural gas fired boilers, identified as units 152 and 153, each with a maximum heat input capacity of 6.277 million British thermal units per hour, and exhausting to two (2) stacks, 43 and 42, respectively.**

A new Section D.3 has been added to the permit as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (e) Two (2) natural gas fired boilers, identified as units 152 and 153, each with a maximum heat input capacity of 6.277 million British thermal units per hour, and exhausting to two (2) stacks, 43 and 42, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) 6.277 MMBtu per hour boiler shall each be limited to 0.36 pounds per MMBtu heat input. This limitation is based on the Pt from the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable pounds of particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = 72.05 MMBtu/hr

$$Pt = 1.09 / (72.05)^{0.26}$$

$$Pt = 0.358 \text{ lbs/MMBtu}$$

Section D.3 has also been added to the Table of Contents.

On the cover page and all affected pages, the Office of Air Management has been changed to the Office of Air Quality.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Lisa M. Wasiowich, at (973) 575-2555, extension 3206, or at (800) 451-6027.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Emissions Calculation Attachments
LMW/EVP

cc: File - Delaware County
U.S. EPA, Region V
Delaware County Health Department
Air Compliance Section Inspector Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR QUALITY

**Indiana Steel and Wire Acquisition Company, Ltd.
2200 East Jackson Street
Muncie, Indiana 47307**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T035-6570-00048	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

First Administrative Amendment AAT035-10506, issued on March 8, 1999
Second Administrative Amendment AAT035-10797, issued on April 5, 1999
Third Administrative Amendment AA T035-10834, issued on April 23, 1999

Fourth Administrative Amendment: AAT035-13610	Pages Affected: Cover page, 3, 3a, 5, 32a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
[326 IAC 2-7-6] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Galvanizing and Oil Tempering Process Lines

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Compliance Determination Requirements

- D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.3 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.4 Record Keeping Requirements
- D.1.5 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Two (2) Natural Gas Fired Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]
- D.2.2 Particulate Matter (PM) Particulate Matter (PM) [326 IAC 6-2]

Compliance Determination Requirements

- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.5 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.6 Record Keeping Requirements
- D.2.7 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Two (2) Natural Gas Fired Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Certification Form

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Semi-annual Compliance Monitoring Report

- (d) Two (2) natural gas fired boilers identified as Boiler 1, constructed in 1955 with a maximum heat input rate of 26 million British thermal units (MMBtu) per hour, and Boiler 3, constructed in 1975 with a maximum heat input rate of 33.5 MMBtu per hour. Each boiler has the capability of firing No. 2 distillate oil as an alternative fuel, and each boiler exhausts to one (1) stack respectively identified as S/V1 and S/V2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1 (21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Asbestos abatement projects regulated by 326 IAC 14-10.
- (c) Pebble lime storage silo with a 30 ton storage capacity, with particulate matter controlled by a baghouse, exhausting at one (1) stack.
- (d) One (1) electric arc furnace (EAF) with a maximum melt capacity of 100 pounds of metal per hour.
- (e) Two (2) natural gas fired boilers, identified as units 152 and 153, each with a maximum heat input capacity of 6.277 million British thermal units per hour, and exhausting to two (2) stacks, 43 and 42, respectively.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (e) Two (2) natural gas fired boilers, identified as units 152 and 153, each with a maximum heat input capacity of 6.277 million British thermal units per hour, and exhausting to two (2) stacks, 43 and 42, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) 6.277 MMBtu per hour boiler shall each be limited to 0.36 pounds per MMBtu heat input. This limitation is based on the Pt from the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable pounds of particulate matter (PM) emitted per
MMBtu heat input

Q = total source max. indirect heater input = 72.05 MMBtu/hr

$$Pt = 1.09 / (72.05)^{0.26}$$

$$Pt = 0.358 \text{ lbs/MMBtu}$$

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 1 of 2 TSD App A

Company Name: Indiana Steel & Wire Acquisition Company, Ltd.
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47303
CP: 035-13610
Plt ID: 035-00048
Reviewer: Lisa M. Wasiowich/EVP
Date: January 10, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.6

110.0

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	5.5	0.3	4.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Page 2 of 2 TSD App A

Company Name: Indiana Steel & Wire Acquisition Company, Ltd.
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47303
CP: 035-13610
Pit ID: 035-00048
Reviewer: Lisa M. Wasiowich/EVP
Date: January 10, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.155E-04	6.598E-05	4.124E-03	9.898E-02	1.870E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.749E-05	6.049E-05	7.698E-05	2.089E-05	1.155E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.